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February 11, 2016

VIA ECF

Honorable Valerie E. Caproni
United States District Judge
Southern District of New York
United States Courthouse
40 Foley Square
New York, New York 10007

Re: ICICI Bank UK plc v. Cargill, Incorporated and Cargill Financial Services International, Inc., 15 Civ. 5379 (VEC)

Dear Judge Caproni:

We represent ICICI Bank UK plc (the “Bank”) in the above-referenced matter. We write on behalf of the parties regarding scheduling issues.

Pre-Trial Conference

The spouse of lead counsel to The Receivables Exchange, LLC (“TRE”) is undergoing a major surgical procedure on February 19, 2016, the date of the next pre-trial conference in this matter. The parties jointly request that the Court adjourn the conference so that he may be present for the surgery.

Mindful of the Court’s preference to hold conferences on Friday, we propose either Friday, March 11 or Friday, March 18, 2016, or any date that is convenient for the Court. Counsel for the Bank will be overseas from February 26 through March 4, 2016.

The parties also respectfully request a corresponding adjournment for the joint status report, which is due today, February 11, 2016, until eight days prior to the new conference date.

Fact Discovery

The parties have made good progress toward completing fact discovery, including productions of documents and conducting a number of depositions. Fact discovery is set to close on Monday, February 15, 2016. We write on behalf of the parties to request that Court extend

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this deadline until February 19, 2016. The request is predicated on a courtesy extended to me earlier this week. On Monday evening, I became ill. At my request, the parties agreed to defer the deposition of an important witness that had been scheduled for Tuesday, February 9, 2016. The extension will allow the deferred deposition to proceed.

The Court previously granted a request for a thirty-day extension for fact discovery, filed by third-party defendant TRE, to which all parties consented.

Respectfully submitted,

/s/Michael T. Sullivan

Michael T. Sullivan

cc: All Counsel of Record (by ECF)